

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

SUNLUST PICTURES, LLC,	)	
	)	
	)	
Plaintiff,	)	
	)	Civil Action No.
	)	8:12-CV-1685-MSS-MAP
v.	)	
	)	December 4th, 2012
TUAN NGUYEN,	)	
	)	
	)	
Defendants,	)	

DEFENDANT TUAN NGUYEN’S OMNIBUS MOTION FOR SANCTIONS
AGAINST NON-PARTIES PRENDA LAW, INC., ILLINOIS ATTORNEY PAUL
DUFFY, CALIFORNIA ATTORNEY BRETT GIBBS, AND ILLINOIS
ATTORNEY JOHN STEELE,

With leave of the court being granted *sua sponte* at the hearing on November 27th, 2012, the Defendant files this Motion for Sanctions against non-party law firm Prenda Law, Inc., Attorney Paul Duffy, Attorney John Steele, and Attorney Brett Gibbs, and states that:

Standard of Law

Pursuant to 28 U.S.C. 1927, [a]ny attorney or other person admitted to conduct cases in any court of the United States or any Territory thereof who so multiplies the proceedings in any case unreasonably and vexatiously may be required by the court to satisfy personally the excess costs, expenses, and attorneys’ fees reasonably incurred because of such conduct. The 11th Circuit has consistently ruled that § 1927 allows the Court to tax attorneys’ fees against lawyers and law firms who vexatiously or knowingly

and wrecklessly pursues a frivolous claim. See Amlong v. Denny's Inc., 457 F.3d 1180, 1190 (11th Cir. 2006) (stating that the touchstone is "bad faith" and a dishonesty of belief or purpose). Defendant has claimed since their first defensive filing that this matter was filed in bad faith, and the activity of Prenda Law at the hearing was further proof of that bad faith and ill intent, and was in no uncertain terms, an attempted fraud upon the court.

Motion for Sanctions against Prenda Law, Inc. and Paul Duffy

Attorney Paul Duffy is the principal of Prenda Law and claims that there are no other owners stockholders or shareholders. In a letter dated November 18th, 2012, Paul Duffy wrote to the court and stated:

"I also respectfully question how my appearance could benefit the Court, particularly since I am not representing *anyone* in this case and have no authority to speak on anyone's behalf. It would clearly be improper for me to make any statement in a matter pending in a jurisdiction in which I am not licensed and on behalf of a client that I do not represent."

(Attached as Exhibit "A")

The court stated in the hearing of November 27th, 2012, that based upon the representation of Attorney Torres, the involvement of Prenda Law, Inc. and therefore the involvement of Mr. Duffy had been established. The court may also base the decision upon the following facts.

Mr. Duffy's signature is on the subpoena issued out of the United States District Court for the Northern District of Illinois, relating to Civil action 1:12-CV-20920-PAS in the Southern District of Florida. (See attached Exhibit "B") This subpoena revealed the name of the internet subscriber with the IP address of 96.254.186.43, and produced the name of the Defendant to Prenda Law, Inc., at 161 N. Clark St. Suite 3200, Chicago IL

60601, the same address listed on the letter where Paul Duffy stated that he did not represent anyone involved in this case.

Further, Mr. Duffy has made appearances in Sunlust v. Does 1-75, 12-CV-1546 (N.D. Ill.), Sunlust v. Sadiq Majid, 12-CV-07868 (N.D. Ill.), and Sunlust v. Norbert Weitendorf, 12-CV-07826 (N.D. Ill.) and possibly other Sunlust matters.

The website www.wefightpiracy.com is the website of Prenda Law, Inc., lists Paul Duffy as the principal, and lists the work product that is the complaint in this matter as their own, stating “Below is a sample of individuals who chose to litigate the matter and are currently in court over their alleged infringement” and then listing the name of the Defendant, along with a link to the complaint in this matter. The complaint is held on Prenda Law’s website at [http://www.wefightpiracy.com/userfiles/Nguyen%20\(FL\).pdf](http://www.wefightpiracy.com/userfiles/Nguyen%20(FL).pdf) and the website reports an address of 161 N. Clark Ste. 3200.

The letter of Paul Duffy sent to this court, his absence at the hearing, and the general denial of any involvement has unreasonably and vexatiously lead to a multiplication of proceedings through an extreme lack of candor. The activities of Prenda Law, Inc., and its agents, at the direction of Paul Duffy as the principal of Prenda Law, have lead to the situation where every document filed within this case is a vexatious multiplication of proceedings. The actions of Paul Duffy and Prenda Law have been responsible for the delay of case management conference, numerous discussions on motions to withdraw, having to review motions to withdraw, and dealing with fallout relating to their shenanigans.

There is only one possible way that the letter is true, and filled with candor, and that would be if John Steele was using Paul Duffy as a “face attorney” using his identity to litigate, and therefore Paul Duffy doesn’t truly represent any Sunlust client.

Another option is that that the letter was not even sent from Paul Duffy, and that it was created by John Steele, and was sent without with or without Paul Duffy’s permission.

A quick and dirty forensic examination of the PDF document, as sent by email by “Angela Van Hammel” of Prenda Law, reports that the PDF document was created by a computer user by the name of Kerry Eckenrode (the maiden name of John Steele’s wife) and was created by “Steele Law Firm.” Exhibit “C” attached gives the simple properties of this document and evidences that it was created on 11/20/2012 even though it is dated the 11/18/2012. It is possible that John Steele created the letter at the request of Paul Duffy, but it is unlikely that it was ever presented to Mr. Duffy for his approval, as he would know of his representation in the Sunlust matters.

It is unlikely that Paul Duffy would own or use a computer associated with John Steele’s wife, which would bear the the name of John Steele’s Illinois family law practice (a relatively new creation, post-Prenda Law and post-Steele Hansmeier). Regardless of whether it was created at the behest of Paul Duffy or John Steele was given carte blanche to create the document, it is common for John Steele to create documents and send e-mails with other attorney’s names to serve his own agenda, with or without their knowledge. When counsel filed his second bar complaint against John Steele, it was for the impersonation of a Florida attorney via e-mail. John Steele’s slippery and wily traits

always resulted in insufficient evidence to prove this Mr. Syfert's claims to the Florida Bar. The loyalty John Steele mysteriously engenders in those around him results in lies to protect him, and therefore insufficient evidence to show that he is violating his affidavit of no UPL attached as Exhibit D.

Motion for Sanctions against Prenda Law, Inc. and Brett Gibbs

Based upon the testimony of Attorney Torres at the November 27th, 2012 hearing all of the litigation activities of local counsel in this case were directed by an agent of Prenda Law, Brett Gibbs. Prenda Law is responsible for the actions of its attorneys and Brett Gibbs is personally responsible for his role in these proceedings. By the analysis of the PDF documents in this case, some documents were created by Brett Gibbs's Macbook. Those documents not created by Gibbs came from a Microsoft Windows machine with a PDF creator plugin from Microsoft Word 2010, that was registered to a user by the name of SH, which is the abbreviation of Steele Hansmeier. It is unlikely that Mr. Gibbs is using both a macbook and a windows machine to create documents for this case and therefore it is unlikely that Mr. Gibbs was calling the shots.

Motion for Sanctions against Prenda Law, Inc. and John Steele

John Steele an Illinois licensed attorney and is the true manager of Prenda Law, Inc. He directs the staff and attorneys affiliated with Prenda Law, Inc., he makes appearances on behalf of Prenda Law, in the Northern District of Illinois, drafts documents and creates litigation strategy for Prenda Law. He authors documents and affixes the signature of Paul Duffy. He brings in clients, and business and is responsible for the day to day operations, management, and litigation decisions of cases within 161 N. Clark, Suite 3200.

An certainly fatal ethical problem if done within the State of Florida, Paul Duffy reportedly works for two Chicago law firms. He is reportedly the sole owner of Prenda Law at 161 N. Clark and apparently is the principal of another law firm, the Paul Duffy Group located at 2 N. LaSalle St., 13th Floor, Chicago, Illinois. He also seems to operate between the two names and address interchangeably as he pleases. There does not appear, at first glance, to be a similar rule of ethics regarding multiple law practices within the State of Illinois as exists in this State

For curiosities sake and because he was in town to watch the Chicago Cubs lose a baseball game, Counsel for Defendant went to 161 N. Clark St in the summer of 2012, and asked the door man to see attorney Paul Duffy. The security guard looked at his list, and said that he did not know about a Paul Duffy, he then called over another co-worker who confirmed that she did not know about a Paul Duffy. When I mentioned that I would like to see John Steele, both of them immediately confirmed his presence within the building, but said that he was likely not around.

Defendant contends with good reasoning based upon all previous experience that the true manager and attorney in charge of Prenda Law is John Steele, and can produce, if challenged to, affidavits of numerous attorneys who have tried to reach Mr. Duffy only to get Mr. Steele. Mr. Steele has informed numerous attorneys practicing within the Federal Courts that, for all practical purposes, in Prenda Law, no one is higher up and the buck stops with him. Those who look to speak with Mr. Duffy are generally directed to Mr. Steele after incredible persistence.

Counsel for Defendant has filed two bar complaints against John Steele, and he is seeking revenge and this is his action as well as the action of the other agents of Prenda

Law. Despite the fact that he reportedly practices law in Illinois or has retired, he was recently featured on the Forbes website speaking about the millions he has made fighting piracy. <http://www.forbes.com/sites/kashmirhill/2012/10/15/how-porn-copyright-lawyer-john-steele-justifies-his-pursuit-of-sometimes-innocent-porn-pirates/>

He does not mention Prenda Law by name, in fact, he specifically avoids it, but he uses the royal “We” when speaking to the Forbes interviewer:

Steele says he files 20 lawsuits a month, and would like to increase this to 300.

“[Copyrighted porn being downloaded for free] is a huge problem,” says Steele. “I think we’ve made a difference. Otherwise, we wouldn’t have made so many people so mad.”

“Critics say we never actually file suit against people, just get their information, then pressure them to settle. But we’re prepared to fight if you don’t want to settle,” says Steele. In the “early stages,” they didn’t do this, but Steele says they are now willing to name names and take these cases to trial, bringing to bear other evidence, gathered from inspecting the accused’s computer and hard drive and interviewing friends and family about their porn habits. “We collect quite a bit of info about the Does.”

From <http://www.forbes.com/sites/kashmirhill/2012/10/15/how-porn-copyright-lawyer-john-steele-justifies-his-pursuit-of-sometimes-innocent-porn-pirates/>

(The article lists Prenda Law as another law firm, but the statements of his multiple filings and “making people sad” could not and do not coincide with any other firm, and was a deception he decided on perpetrating only after the filings in this case.)

During the hearing, John Steele was sitting in the gallery and he desperately avoided the use of the royal “We” when referring to the activities of Prenda Law. John Steele wanted to make very clear that although Mark Lutz was looking to him for assistance that he had nothing to do with the case or with Prenda Law. In his Forbes interview, Mr. Steele is filing 20 lawsuits a month with hopes to increase to 300 and he is

raking in millions for his efforts. Before this Court, his demeanor is that he is essentially retired, just a fan of bittorrent litigation, in town from Miami or from Chicago, because civil motion arguments as interesting as to him as a Cubs game. He projects that he is a passing acquaintance of Mr. Duffy, and has nothing to do with the case, but has the knowledge to allege that the principals of the Plaintiff were in India (even though that was also a lie). He also knew the correct pronunciation of one of the principals of Sunlust Pictures.

On top of everything, John Steele seemed most thoroughly motivated to impart to the court that he was not holding himself out to be an attorney licensed within the State of Florida.

The testimony of Mark Lutz brought forth a statement that seemed believable and certainly implicates John Steele. Mark Lutz stated that he has never really talked to Paul Duffy. He says that he has never spoke to Mr. Duffy despite that he has been employed by Steele|Hansmeier, PLLC (see Exhibit E for Mr. Lutz's LinkedIn profile), was once being employed by Prenda Law, Inc. according to filings with the Florida Bar, and is registered agent of Prenda Law Inc., with Florida's Secretary of State. (See Exhibit F listing President Paul Duffy at 161 N. Clark, Chicago and Mark Lutz as the Registered Agent). While he was far from a model of truth, he seemed truthful that he had never spoken with Duffy, and the only way it is believable that he has never spoken with Paul Duffy is if John Steele is filling the role of manager. When Mr. Lutz felt like he was in a little bit of trouble within the courtroom, he was looking to John Steele, his manager, for guidance through the difficult hearing.

The Forbes article quotes Steele as working with approximately two dozen “adult entertainment clients.” Before this Court, Steele said he makes occasional appearances on an ad hoc basis. This statement was probably designed to dodge the statement made within his affidavit that he will not have a regular presence for the practice of law in the State of Florida. He likely still resides in Miami, yet practices law in the State of Illinois, remotely, via a Paul Duffy proxy identity.

“Earlier this year, California woman Liuxia Wong sued Hard Drive Productions (represented by John Steele) for trying to extort her, accusing her of illegally downloading “Amateur Allure Jen” and requesting \$3,4000 from her to settle the suit. She and her husband had an open Wi-Fi network and said they had no idea who might have downloaded the movie. Steele settled the suit for an undisclosed amount.”

From <http://www.forbes.com/sites/kashmirhill/2012/10/15/how-porn-copyright-lawyer-john-steele-justifies-his-pursuit-of-sometimes-innocent-porn-pirates/2/>

The lawsuit referred to in the article took place in California, and Brett Gibbs was the attorney on that matter acting in his capacity as an agent of Prenda Law. *Wong v. Hard Drive Productions*, 4:12-CV-00469-YGR (N.D. Cal 2012). The Forbes article lists Prenda Law as another law firm, but this is a ruse perpetrated by Mr. Steele to hide his true involvement. Mr. Steele’s “ad hoc” representation that he alluded to in the hearing happens only for Prenda Law, and his day job is doing “ad hoc” management for Prenda Law.

Who decided to bring Mark Lutz?

When deciding to award sanctions against the attorneys in this matter for their attempted fraud on the court, the question should be asked, who decided to bring Mark Lutz? Certainly, if Paul Duffy, principal of Prenda Law did not ask him to attend,

because they have never had a conversation, and local counsel did not ask him to attend, it seems unlikely that Brett Gibbs arranged his attendance from California.

When brought up before the court, Illinois attorney John Steele initially denied knowing anyone associated with Sunlust, and then suddenly, as if he was just a fan of the products that they produce, recalled that Sunny Leone is somehow associated with Prenda Law. Then, Mr. Steele goes on to misspell her name “S-O-N-N-Y” before reiterating that he is not practicing law in Florida. Mr. Steele’s appearance at that hearing was not based upon curiosity of how that particular hearing was going to turn out. Instead he was attempting in vain to terrorize counsel for the Plaintiff because of the pain and embarrassment behind the bar complaints, and maybe to get an in-person look at the guy who reported him for operating his business within the State of Florida.

Mr. Lutz in the transcript mentions that he is a paid corporate representative of an entity called Guava, another Prenda Law client named Guava, LLC. Mr. Steele makes personal appearances in the Guava cases within the Northern District of Illinois, and counsel for Plaintiff is unaware of any Guava cases filed within the State of Florida.

John Steele wants this court and every court within Florida to believe that he is now a man without a law firm, a rogue “Of counsel” mercenary that is not affiliated with Prenda Law. Now that Prenda Law is an Illinois law firm practicing out of Chicago, Illinois attorney John Steele could be a shareholder, owner, partner, associate, and publicly share in the fortune of his spoils. His continuous deception within the Federal court system should be acknowledged by the court by an award of fees against him.

Request for Relief

WHEREFORE the Defendant requests that a judgment be entered in the total amount of reasonable fees and costs, including a lodestar multiplier, according to the forthcoming motion for fees against Sunlust Pictures LLC, and asks that any order of fees as a consequence of that motion attorneys fees be also awarded jointly and severally against Sunlust Pictures, LLC, Prenda Law, Inc., John Lawrence Steele, Brett L. Gibbs, and Paul A. Duffy.

Defendant requests an instant award of sanctions of \$1,600.00 for the 6.4 hours in the drafting and editing of this motion and compiling of exhibits and associated research, and reserves additional sanctions jointly and severally against Prenda Law, Inc., John Lawrence Steele, Brett L. Gibbs, and Paul A. Duffy, in the full amount of the attorneys fees and costs, if so awarded.

Dated this 4th day of December, 2012.

Respectfully submitted,
Graham W. Syfert, Esq.,P.A.

By: s/ Graham W. Syfert
Graham W. Syfert (39104)
Trial Counsel
FL/GA Attorney at Law
1529 Margaret St, Unit 2
Jacksonville, FL 32204
Phone: (904) 383-7448
Fax: (904) 638-4726
graham@syfert.com

I HEREBY CERTIFY, that a true and correct copy of the foregoing was sent by e-mail this day, to attorney for the Plaintiffs, Matthew Wasinger, mattw@wasingerlawoffice.com, blgibbs@wefightpiracy.com, jlsteele@wefightpiracy.com, paduffy@wefightpiracy.com and paduffy@wefightpiracy.com, this 4th of December, 2012.

By: s/ Graham W. Syfert
Graham W. Syfert (39104)



November 18, 2012

Paul A. Duffy
Prenda Law, Inc.
161 N. Clark St. Ste 3200
Chicago, IL 60601

Honorable Judge Mary S. Scriven
U.S. District Court for the Middle District of Florida
Sam M. Gibbons U.S. Courthouse
801 North Florida Ave.
Tampa, FL 33602

Re: Order at Dkt. 17 in Case no. 8:12-cv-01685-MSS-MAP

Dear Judge Scriven:

I have very recently been made aware that the Court ordered “a principal of Prenda Law, Inc.” to appear in person at a motion to dismiss hearing scheduled for November 27, 2012 in case number 8:12-cv-01685-MSS-MAP. (Dkt. 17.) As the sole principal of Prenda Law, Inc. (“Prenda”), that would be me. For the record, I was never served with notice of the Court’s order or otherwise made aware of it---until very recently via a phone call from a fellow attorney.

As an initial matter, I must respectfully inform the Court that I am located in Chicago, Illinois and my attendance at the hearing would require air travel. Due to a recent surgery on my eye, my doctor has ordered me not to travel by air due to the high risk of catastrophic injury or death due to changes in air pressure. I will be pleased to provide the Court with a surgeon’s note upon request. Further, on November 27, 2012, I have three status hearings at 10:00 a.m. (EST) scheduled in the U.S. District Court for the Northern District of Illinois.

I also respectfully question how my appearance could benefit the Court, particularly since I am not representing *anyone* in this case and have no authority to speak on anyone’s behalf. It would clearly be improper for me to make any statement in a matter pending in a jurisdiction in which I am not licensed and on behalf of a client that I do not represent.

In light of the foregoing statements, I pray that the Court will excuse my attendance at the November 27, 2012 hearing.

cc: Counsel of Record (via e-mail)

Sincerely,

A handwritten signature in blue ink that appears to read 'Paul A. Duffy'.

Paul A. Duffy, Esq

AO 88B (Rev. 06/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Northern District of Illinois

SUNLUST PICTURES, LLC

Plaintiff

v.

DOES 1-120

Defendant

Civil Action No. 1:12-cv-20920-PAS

(If the action is pending in another district, state where:
Southern District of Florida)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Subpoena Compliance/Custodian of Records: Verizon Online, LLC c/o C T Corporation System; 208 S. LaSalle
St. Suite 814, Chicago, IL 60604-1101.

☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: In accordance with the conditions in the attached order, provide the name, current (and permanent) addresses, telephone numbers, e-mail addresses and Media Access Control addresses of all persons whose IP addresses are listed in the attached spreadsheet. We will be pleased to provide data to you in the most efficient and cost effective format if you let us know what your preferred format is.

Place: Prenda Law Inc.
161 N Clark St. Suite 3200
Chicago, IL 60601

Date and Time:

04/23/2012 10:00 am

☐ **Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 03/14/2012

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party)

Sunlust Pictures, LLC

, who issues or requests this subpoena, are:

Paul Duffy, Prenda Law, Inc.; 161 N. Clark St. Suite 3200, Chicago IL 60601; paduffy@wefightpiracy.com; (312) 880-9160

812-cv-01685-MSS-MAP Letter.pdf - Adobe Acrobat Professional

File Edit View Document Comments Forms Tools Advanced Window Help

Create PDF Combine Files Export Start Meeting Secure Sign Forms Review & Comment

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Exhibit C

Document Properties

Description Security Fonts Initial View Custom Advanced

Description

File: 812-cv-01685-MSS-MAP Letter.pdf

Title: Steele Law Firm

Author: Kerry Eckenrode

Subject:

Keywords:

Created: 11/20/2012 3:11:52 PM Additional Metadata...

Modified: 11/20/2012 3:11:52 PM

Application: Microsoft® Office Word 2007

Advanced

PDF Producer: Microsoft® Office Word 2007

PDF Version: 1.5 (Acrobat 6.x)

Location: C:\Documents and Settings\Owner\Desktop\

File Size: 181.82 KB (186,186 Bytes)

Page Size: 8.50 x 11.00 in Number of Pages: 1

Tagged PDF: Yes Fast Web View: No

Help OK Cancel

November

Paul A. Du

Prenda Law

161 N. Cla

Chicago, IL

Honorable J

U.S. Distric

Sam M. Gil

801 North E

Tampa, FL

Re: Order a

Dear Judge

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In light of the foregoing statements, I pray that the Court will excuse my attendance at the November 27, 2012 hearing.

cc: Counsel of Record (via e-mail)

Sincerely,

[Signature]

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THE FLORIDA BAR

444 BRICKELL AVENUE

RIVERGATE PLAZE, SUITE M-100

MIAMI, FL 33131-2404

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

(305) 377-4445
WWW.FLORIDABAR.ORG

November 30, 2011

Graham W Syfert, Esq
1529 Margaret St, Unit 2
Jacksonville, FL 32204

**Re: Unlicensed Practice of Law Investigation of John L Steele
The Florida Bar File No. 2012-4035(11B)**

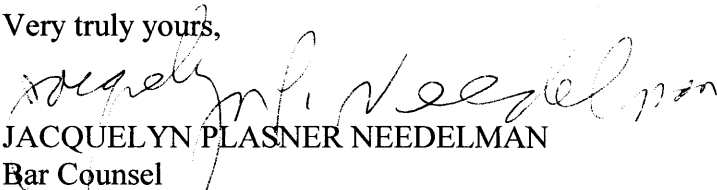
Dear Mr. Syfert:

You filed an unlicensed practice of law complaint against the above-referenced individual.

I have closed the case based on the acceptance of a cease and desist affidavit (copy attached). The affidavit does not require the individual to admit any wrong-doing, however, the individual agrees not to engage in any activities which constitute unlicensed practice of law under existing decisions of the Supreme Court of Florida.

Thank you for bringing this matter to the attention of The Florida Bar. If you have any questions concerning the committee's action, please feel free to contact me.

Very truly yours,


JACQUELYN PLASNER NEEDELMAN
Bar Counsel
Unlicensed Practice of Law Department - Miami

JPN:ah

Encl.

CEASE AND DESIST AFFIDAVIT

STATE OF FLORIDA

COUNTY OF MIAMI-DADE

BEFORE ME, the undersigned authority, duly authorized to administer oaths, personally appeared, JOHN L. STEELE, who after first being duly sworn, upon oath, deposes and says as follows:

1. I am not a member of The Florida Bar and am not licensed to practice law in the State of Florida.
2. I understand that it constitutes a contempt of the Supreme Court of Florida as well as a third degree felony under the Florida Statutes, for an unlicensed individual to engage in the practice of law and/or hold himself out as authorized to so practice in Florida.
3. I further understand that it constitutes the unlicensed practice of law for an unlicensed individual to:
 - (a) in any way hold himself out as being a Florida licensed attorney and/or able to render legal advice or services in the State of Florida;
 - (b) render legal advice or legal services or otherwise engage in the general practice of law in the State of Florida without being a member of The Florida Bar;
 - (c) hold himself out in Florida as being licensed as an attorney;
 - (d) send letters on Florida letterhead from an attorney on behalf of another person in a legal matter;
 - (e) have a regular presence for the practice of law in the State of Florida.
4. I have read or will read the cases of The Florida Bar v. Savitt, 363 So.2d 559 (1978); The Florida Bar v. Tate, 552 So.2d 1106 (1989); The Florida Bar v. York, 689 So.2d 1037 (1997); State v. Sperry, 140 So. 2d 587 (Fla. 1962), vacated on other grounds, Sperry v. State, 373 U.S. 379 (1963)' and Chandris v. Yanakakis, 668 So. 2d 180 (Fla. 1995), and agree to abide by the requirements of said cases and Rules.
5. I further agree that I will not engage in any of the aforementioned activities which constitute the unlicensed practice of law.
6. By signing this cease and desist affidavit, I am not making any admissions of wrong doing and there have not been any findings of wrong doing.

FURTHER AFFIANT SAYETH NAUGHT.

JOHN L. STEELE

The foregoing instrument was acknowledged before me this 14 day of November, 2011,
by JOHN L. STEELE, who is personally known to me or who has produced

FL DL # as
identification and who did take an oath.

Ada Garcell
Notary Public Signature

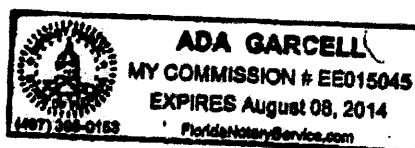
Ada Garcell
Name of Notary Public

(Type, Print or Stamp)

Notary Public, State of Florida

Commission No. EE015045

My Commission Expires: August 8, 2014



Mark Lutz

Sr. Sales Executive

Miami Beach, Florida (Miami/Fort Lauderdale Area) | Financial Services

[Join LinkedIn and access Mark Lutz's full profile.](#)

As a LinkedIn member, you'll join 175 million other professionals who are sharing connections, ideas, and opportunities. And it's free! You'll also be able to:

- See who you and **Mark Lutz** know in common
- Get introduced to **Mark Lutz**
- Contact **Mark Lutz** directly

[View Full Profile](#)

Mark Lutz's Overview

Current	Sr. Account Executive at Accord Assets
Past	Client Services at Steele Hansmeier National Accounts Manager at THG Sports Director at Marcus Evans
Education	Arizona State University
Recommendations	1 person has recommended Mark
Connections	75 connections
Websites	Company Website

Mark Lutz's Experience

Sr. Account Executive

Accord Assets

Privately Held; 11-50 employees; Financial Services industry
August 2012 – Present (4 months) | Miami Beach, FL

Accord Assets LLC, has the financial flexibility to guarantee the highest payout and the most financial options for our clients. We provide options to you that others simply cannot and we do not charge any up-front fees. Our company acquires assets at a premium value including:

CD's
Annuities
Structured Financial Settlements
Life Insurance Policies
Performing and Non-performing Assets
Stocks - Restricted or Non-Restricted
Receivables and Notes
Tangible Assets
... and more

We provide innovative financial options to you that guarantee the highest payout in the industry. We work with Attorneys, Tax Planners and Insurance Professionals to provide you with the highest value possible for YOUR asset. We can offer you lump sum payments NOW or long-term asset appreciation / exchange options over time. Our substantial asset base provides us with the flexibility to provide maximum payouts that others cannot.

Client Services

Steele Hansmeier

Legal Services industry
January 2011 – August 2012 (1 year 8 months) | Greater Chicago Area

Our practice includes addressing the unique legal issues posed by Internet-based piracy, where the vast majority of infringement occurs under the cover of IP addresses.

National Accounts Manager

THG Sports

Privately Held; 1001-5000 employees; Hospitality industry
June 2010 – December 2010 (7 months)

Director

Marcus Evans

Privately Held; 1001-5000 employees; Events Services industry
January 2008 – December 2010 (3 years)

Mark Lutz's Education

Arizona State University

Finance
1998 – 2001

Mark Lutz's Additional Information

Websites:

- [Company Website](#)

Groups and
Associations:



International Luxury Network

International Wealth Management Group



THG Sports

Contact Mark for:

- new ventures
- expertise requests
- reference requests
- job inquiries
- business deals
- getting back in touch

View Mark Lutz's full profile to...

- See who you and **Mark Lutz** know in common
- Get introduced to **Mark Lutz**
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Foreign Profit Corporation

PRENDA LAW, INC.

Filing Information

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Principal Address

161 N CLARK ST STE 3200
CHICAGO IL 60601

Mailing Address

161 N CLARK ST STE 3200
CHICAGO IL 60601

Registered Agent Name & Address

LUTZ, MARK
1111 LINCOLN RD
STE 400
MIAMI BEACH FL 33139 US
Address Changed: 01/03/2012

Officer/Director Detail

Name & Address

Title CP
DUFFY, PAUL
161 N CLARK ST STE 3200
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2012 01/03/2012

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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

<u>SUNLUST PICTURES, LLC,</u>	)	
	)	
	)	
Plaintiff,	)	
	)	Civil Action No.
	)	
	)	8:12-CV-1685-MSS-MAP
v.	)	
	)	
TUAN NGUYEN,	)	
	)	
	)	PROPOSED ORDER
<u>Defendant.</u>	)	

ORDER ON DEFENDANT TUAN NGUYEN'S MOTION FOR SANCTIONS
AGAINST PRENDA LAW, BRETT GIBBS, PAUL DUFFY, JOHN STEELE

THIS MATTER, having come before this court on Defendant's motion for sanctions against Prenda Law, Brett Gibbs, Paul Duffy, and John Steele, and the court being fully apprised of its premises, and a hearing being held where an agent of Prenda Law was to appear, and that agent, nor any other confessed agent appearing before the court, and having found bad faith and attempted fraud on the court by agents of Prenda Law:

IT IS THEREFORE ORDERED that Defendant is awarded and shall recover from Prenda Law, Inc., Brett L. Gibbs, Paul A. Duffy, and John L. Steele, jointly and severally in the amount of \$1600.00, which shall accrue interest at the statutory rate and let execution issue.

IT IS FURTHER ORDERED that any judgment for attorneys' fees and costs awarded in this matter shall be issued jointly and severally against Sunlust Pictures, LLC, and the attorneys and firm mentioned above.

IT IS SO ORDERED

United States District Judge Mary S. Scriven

cc: Counsel of Record